



May 29, 2025

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VIA ECF

Magistrate Judge Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Korey Watson v. City of New York, FJC Security Services, Inc., Sabrina Duncan (HRA), Ashley Johnson (FJC), Kern Proberherbs (HRA), Natasia Lyles (FJC), Tamika Jenkins (FJC), Patricia Robinson (FJC) and Sean Williams (FJC)*
Location : New York City Human Resources Administration (HRA)
Case No. : 1:23-cv-08975-LDH-TAM
Our File No. : 20147-00291

Dear Judge Merkl:

We represent defendants FJC Security Services, Inc., Tamika Jenkins, Ashley Johnson, Natasia Lyles, Patricia Robinson, and Sean Williams (herein collectively referred to as “Allied Defendants”). I write on behalf of the parties to jointly and respectfully request that the Court adjourn *sine die* the Settlement Conference currently scheduled for tomorrow, May 30, 2025, and permit the parties to file a joint status report on or before June 6, 2025.

By way of background, plaintiff commenced this action on December 6, 2023 alleging that, on September 7, 2022, he appeared at the Human Resources Administration office, as instructed, at 275 Bergen St., to resolve issues with his benefits when he was stabbed with a boxcutter by another individual in line for services. *See* Civil Docket Entry No. 1. Plaintiff alleges, *inter alia*, that defendants City of New York, FJC Security, and John and Jane Doe FJC Security officers violated his both his state and federal constitutional rights, and brings additional state law claims including a claim for negligent hiring and training. *Id.* On May 29, 2024 Plaintiff filed an amended complaint adding seven John Doe defendants¹ as parties in this action.

¹ The individually named defendants are Sabrina Duncan, Ashley Johnson, Kern Proberherbs, Natasia Lyles, Tamika Jenkins, Patricia Robinson, and Sean Williams. *See* Civil Docket Entry No. 18.

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This adjournment is now necessary because, while in the process of obtaining authority, counsel for the City of New York was made aware earlier today that it appears plaintiff executed a General Release in another matter against the City on or about August 14, 2024. That matter appears to have resolved in its pre-litigation phase. Subsequently, counsel for the City contacted all counsel in this matter. The parties then engaged in a brief meet and confer this afternoon.

In light of this discovery, the City will not have authority for tomorrow's conference. Further, it appears motion practice may be required. With this adjournment, the parties will each confer internally and with each other to determine appropriate next steps in this matter. With the Court's authority, the parties seek permission to file a status report with proposed next steps and, if appropriate, a proposed briefing schedule for any motion practice.

Accordingly, the parties jointly and respectfully request that the Court adjourn *sine die* the Settlement Conference currently scheduled for tomorrow, May 30, 2025, and permit the parties to file a joint status report on or June 6, 2025.

Thank you for your consideration.

Respectfully submitted,

Wilson Elser Moskowitz Edelman & Dicker LLP

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JPW/abm